

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	X	
	:	
UNITED STATES OF AMERICA	:	<u>INFORMATION</u>
	:	
- v. -	:	22 Cr. 159
	:	
RICHARD LEAF,	:	
a/k/a "Alex Bronson,"	:	
	:	
	:	
Defendant.	:	
	:	
- - - - -	X	

COUNT ONE
(Receipt of Child Pornography)

The United States Attorney charges:

1. Between in or about March 2019, and in or about April 2020, in the Southern District of New York and elsewhere, RICHARD LEAF, a/k/a "Alex Bronson," the defendant, knowingly received and distributed material containing child pornography that had been mailed, and using means and facilities of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, LEAF received child pornography through a computer in Westchester County, New York.

(Title 18, United States Code, 2252A(a)(2)(A) and (b)(1).)

COUNT TWO
(Possession of Child Pornography)

The United States Attorney charges:

2. In or about May 2020, in the Southern District of New York and elsewhere, RICHARD LEAF, a/k/a "Alex Bronson," the defendant, knowingly did possess, and knowingly did access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material containing an image of child pornography that had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, LEAF possessed images and videos of child pornography on a computer located in Westchester County, New York.

(Title 18, United States Code, Section 2252A(a) (5) (B) and
(b) (2) .)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Counts One and Two of this Information, RICHARD LEAF, a/k/a "Alex Bronson," the defendant, shall forfeit to the United

States, pursuant to Title 18, United States Code, Section 2253, any and all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from said offense and any and all property, real or personal, used or intended to be used to commit or promote the commission of said offense or traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision


4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2253;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


DAMIAN WILLIAMS
United States Attorney
Southern District of New York

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

RICHARD LEAF,
a/k/a "Alex Bronson,"
Defendant.

INFORMATION

22 Cr.

(18 U.S.C. § 2252A(a) (2) (A), (a) (5) (B),
(b) (1), and (b) (2).)

DAMIAN WILLIAMS
United States Attorney
